

Bureau of Waste Management
Curtis State Office Building
1000 SW Jackson, Suite 320
Topeka, KS 66612-1366



phone: 785-296-1600
fax: 785-296-1592
email: bwmweb@kdheks.gov
www.kdheks.gov/waste

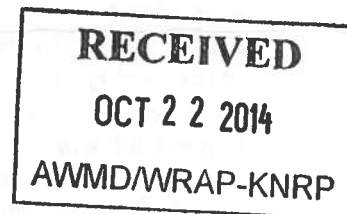
Robert Moser, MD, Secretary

Department of Health & Environment

Sam Brownback, Governor

October 20, 2014

Brenda B. Epperson
Environmental Manager
MRP Properties Company, LLC
P.O. Box 696000
San Antonio, TX 78269-6000



**RE: Sampling and Analysis Plan Modification
MRP Properties Company, LLC
1400 South M Street, Arkansas City, Kansas
RCRA ID# KSD087418695**

Dear Ms. Epperson,

The Kansas Department of Health and Environment (KDHE) and the United States Environmental Protection Agency (EPA) Region 7 reviewed the proposed revisions to the Part I and Part II Sampling and Analysis Plan (SAP) submitted on October 17, 2014 by MRP Properties Company, LLC (MRP) for the Former Total Petroleum, Inc. refinery in Arkansas City. These revisions were a result of an October 16th telephone conversation between KDHE and MRP discussing a KDHE letter dated October 15, 2014. The current SAP describes groundwater monitoring required under the Part I Permit to evaluate groundwater corrective action measures within the Waste Management Area (WMA) and groundwater monitoring under the Part II Permit which evaluates the effectiveness of interim corrective measures in areas of the facility outside of the WMA. The purpose of these proposed changes to the SAP are to develop a consistent and cost-effective approach between the Part I and Part II groundwater monitoring programs. KDHE and EPA have the following comments on the document:

1. MRP proposes to sample the Part I and Part II groundwater monitoring wells for the following list of constituents:

VOCs:

Benzene
Toluene
Ethylbenzene
Xylenes
1,2-Dichloroethane
1,2,4-Trimethylbenzene
1,3,5-Trimethylbenzene

SVOCs:

Naphthalene
1-Methylnaphthalene
2-Methylnaphthalene

METALS:

Arsenic

RCRA



534460

At this time, KDHE and EPA find the above list of constituents acceptable. Although no changes will be made to the requirements for corrective action groundwater monitoring in the Part I Permit at this time, MRP agrees to voluntarily analyze Part I groundwater samples for the list of constituents described above.

2. KDHE agrees with MRP that the sampling frequency for the Part I and Part II monitoring wells should be scheduled to occur as one event. Site-wide sampling of the groundwater monitoring wells during one event will not only be cost-effective but will also allow the collection of groundwater data that will be consistent across the entire facility. Part I and Part II monitoring wells will be sampled semi-annually for the constituents described in Comment #1. The monitoring wells to be sampled for Part I will remain the same whereas the Part II list will contain all wells listed as Part II wells in Table 1 of the MRP proposal. KDHE and EPA will review the analytical results from the next two semi-annual sampling events and will consider modifications to the list of constituents to be analyzed and/or wells to be sampled based on data collected and recommendations from MRP.
3. Please update Addendum No. 1 to Appendix P (Groundwater Sampling and Analysis Plan), RCRA Part B Permit Application, to include all the Part II monitoring wells listed in Table 1 of the Part II Permit Groundwater Monitoring Plan proposal dated October 17, 2014. MRP will also modify the list of constituents to be analyzed per Comment #1 and update any maps of the Part II monitoring well network.

Based on agreement with the comments and conditions summarized above, KDHE and EPA hereby approve the modifications to the Part I and Part II groundwater sampling protocols. Please respond in writing by October 27, 2014 if MRP disagrees with the summary presented above. Upon acceptance by MRP, this letter supersedes the previous approval letter dated October 15, 2014. Revisions to Addendum No. 1 are to be submitted by November 7, 2014. If you have any questions regarding this letter, please contact me by phone at (785)-291-3760 or e-mail at (mvishnefske@kdheks.gov).

Sincerely,



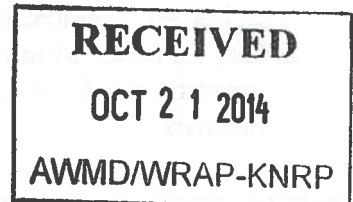
Mark Vishnefske
Environmental Scientist III
Hazardous Waste Corrective Action and Geology Unit

cc: Jay Mednick – MWH
Brad Roberts – EPA Region VII - AWMD/WRAP
Allison Herring – DEA/SCDO/Waste Programs
Bill Bider – BWB



October 15, 2014

Brenda B. Epperson
Environmental Manager
MRP Properties Company, LLC
P.O. Box 696000
San Antonio, TX 78269-6000



**RE: Sampling and Analysis Plan Modification
MRP Properties Company, LLC
1400 South M Street, Arkansas City, Kansas
RCRA ID# KSD087418695**

Dear Ms. Epperson,

The Kansas Department of Health and Environment (KDHE) and the United States Environmental Protection Agency (EPA) Region 7 reviewed the proposed revisions to the Part I and Part II Sampling and Analysis Plan (SAP) submitted on September 30, 2014 by MRP Properties Company, LLC (MRP) for the Former Total Petroleum, Inc. refinery in Arkansas City. The current SAP describes groundwater monitoring required under the Part I Permit to evaluate groundwater corrective action measures within the Waste Management Area (WMA) and groundwater monitoring under the Part II Permit which evaluates the effectiveness of interim corrective measures in areas of the facility outside of the WMA. The purpose of these proposed changes to the SAP are to develop a consistent and cost-effective approach between the Part I and Part II groundwater monitoring programs. KDHE and EPA have the following comments on the document:

1. MRP proposes to sample the Part I and Part II groundwater monitoring wells for the same list of constituents. In addition to naphthalene, this list will consist of all volatile organic compounds (VOCs) included in Attachment B of the Part I Permit. KDHE generally agrees with the proposed list of constituents but notes that there were three constituents (1-methylnaphthalene, 2-methylnaphthalene, and arsenic), not included in the above list, that were detected at levels exceeding Kansas Risk-Based Standards (RSKs) in numerous groundwater samples collected during the last two semi-annual sampling events. Based on this information, it would be prudent to add 1-methylnaphthalene, 2-methylnaphthalene, and arsenic to the list. Although no changes will be made to the requirements for corrective action groundwater monitoring in the Part I Permit at this time, MRP agrees to voluntarily analyze Part I groundwater samples for the list of constituents described above.
2. KDHE agrees with MRP that the sampling frequency for the Part I and Part II monitoring wells should be scheduled to occur as one event. Site-wide sampling of the groundwater monitoring wells during one event will not only be cost-effective but will also allow the collection of groundwater data that will be consistent across the entire facility. Part I and Part II monitoring wells will be sampled semi-annually for the constituents described in Comment #1 and sampled every 3 years for the full list of Groundwater Protection Standard (GWPS), contained in Attachment B of the Part I Permit. The monitoring wells to be sampled for Part I will remain the same whereas the Part II list will contain all wells listed as Part II

wells in Table 1 of the MRP proposal. KDHE and EPA will review the analytical results from the next two semi-annual sampling events and will consider modifications to the list of constituents to be analyzed and/or wells to be sampled based on data collected and recommendations from MRP.

3. Please update Addendum No. 1 to Appendix P (Groundwater Sampling and Analysis Plan), RCRA Part B Permit Application, to include all the Part II monitoring wells listed in Table 1 of the Part II Permit Groundwater Monitoring Plan proposal dated September 30, 2014. MRP will also modify the list of constituents to be analyzed per Comment #1 and update any maps of the Part II monitoring well network.

Based on agreement with the comments and conditions summarized above, KDHE and EPA hereby approve the modifications to the Part I and Part II groundwater sampling protocols. Please respond in writing by October 22, 2014 if MRP disagrees with the summary presented above. Revisions to Addendum No. 1 are to be submitted by October 31, 2014. If you have any questions regarding this letter, please contact me by phone at (785)-291-3760 or e-mail at (mvishnefske@kdheks.gov).

Sincerely,



Mark Vishnefske
Environmental Scientist III
Hazardous Waste Corrective Action and Geology Unit

cc: Jay Mednick – MWH
Brad Roberts – EPA Region VII - AWMD/WRAP
Allison Herring – DEA/SCDO/Waste Programs
Bill Bider – BWB